

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

FILED/ACCEPTED

FEB 27 2009

Federal Communications Commission
Office of the Secretary

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Comcast Legal Entities Listed in Attachment A

Form 499 Filer ID: See Attachment A

Name of signatory: Catherine Avgiris

Title of signatory: Senior Vice President and General Manager of Voice Services

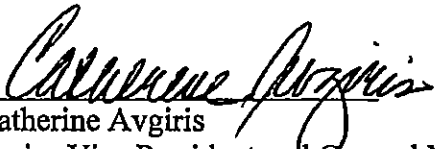
I, Catherine Avgiris, certify that I am an officer of the Comcast Legal Entities listed in Attachment A hereto (collectively referred to as "the Company" or "Comcast") and acting as an agent of the Company, and that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification are two accompanying statements. The first statement explains how the Company's procedures ensured that the Company was in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. As to compliance, the second statement details a technical issue Comcast encountered during 2008 regarding the notification requirements of section 47 C.F.R. § 64.2010(f).

[REDACTED]

The Company did receive customer complaints in 2008 concerning the alleged unauthorized release of CPNI. Attached to this certification is a summary of the number of customer complaints Comcast has received related to alleged unauthorized access to, or alleged unauthorized disclosure of CPNI, broken down by category of complaint.

Signed


Catherine Avgiris

Senior Vice President and General Manager of Voice Services

February 27, 2009

Comcast CPNI Compliance Statement - 2008

Comcast has developed and implemented procedures designed to ensure compliance with the FCC's rules at 47 C.F.R. § 64.2001, *et seq.*, governing the use and disclosure of CPNI. Compliance with such rules is demonstrated by the policies, practices, training and audit procedures currently employed by Comcast. Following is a brief explanation of the procedures Comcast currently employs.

First, as to the use of CPNI for marketing purposes, it is Comcast's policy not to authorize the use of CPNI for the purpose of marketing service offerings among the different categories of service that Comcast provides to subscribers.

Second, it is Comcast's policy not to share CPNI with third party vendors or joint venture partners for the purpose of marketing and Comcast does not authorize the use of Comcast subscribers' CPNI by third party vendors or joint venture partners for the purposes of marketing.

Third, it is Comcast's policy to only release CPNI to third party vendors or joint venture partners pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of CPNI, and then only for the limited purposes of initiating, rendering, billing, maintaining and/or collecting for services rendered to the subscribers of Comcast.

Fourth, the agents of Comcast are not authorized to discuss call detail information over the phone unless the customer is first able to: provide a four digit security PIN number assigned to the customer by Comcast,¹ answer a back-up security question not based on readily available biographical information or account information, or is first able to identify and provide specific information about the call(s) [REDACTED] without the agent's assistance.

Fifth, it is Comcast's policy not to provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information or the customer is able to answer a back-up security question not based on readily available biographical information or account information.

Sixth, it is Comcast's policy not to disclose CPNI to a customer at a retail location unless the customer presents a valid photo ID matching the customer's account information.

Seventh, [REDACTED]

¹ [REDACTED]

REDACTED – FOR PUBLIC INSPECTION

Eighth, Comcast employs a variety of internal and external operating procedures designed to ensure compliance with CPNI regulations. Such procedures include:

A) The publication of a privacy policy including CPNI-specific policies on Comcast.com and circulation of that policy within Comcast during CPNI training.

B) Regular recurring training programs concerning the proper treatment, use and disclosure of CPNI.

C) The implementation and administration of an employee disciplinary program designed to ensure compliance with internal procedures. Such program includes a variety of different penalties for the violation of internal privacy procedures, including the termination of employment where appropriate.

[REDACTED]

Ninth, it is Comcast's policy to notify law enforcement of a breach of its customers' CPNI as soon as practicable, and in no event later than 7 business days, after reasonable determination of the breach, by electronic notification to the United States Secret Service and the Federal Bureau of Investigation through a central reporting facility. Comcast will not notify customers or disclose the breach to the public until 7 full business days have passed after notification except when it believes there is an extraordinarily urgent need and after consultation with and in cooperation with the relevant investigating agency. Comcast will delay notification to customers or the public if directed to do so in writing by the investigating agency. Comcast maintains a record for at least 2 years of any breaches discovered and notifications made.

[REDACTED]

REDACTED - FOR PUBLIC INSPECTION

2008 CPNI Complaint Summary of Comcast Corporation

CPNI Complaints	2008
• Unauthorized Access by Employees	
Total Complaints Received	0
Valid Complaints	0
• Improper Disclosure to Unauthorized Parties	
Total Complaints Received	17
Valid Complaints	4
• Improper Access to On-Line Information by Unauthorized Parties	
Total Complaints Received	240
Valid Complaints	0
• Unauthorized Changes to Customer Record	
Total Complaints Received	3110
Valid Complaints	0
Actions Taken Against Pretexters	
Court Actions	0
State Commission Actions	0
FCC Actions	0

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ATTACHMENT A

	FORM 499 FILER ID	LEGAL NAME
1.	825948	Comcast IP Phone, LLC
2.	825947	Comcast IP Phone II, LLC
3.	826643	Comcast IP Phone III, LLC
4.	826642	Comcast IP Phone IV, LLC
5.	826641	Comcast IP Phone V, LLC
6.	826988	Comcast IP Phone VI, LLC
7.	826989	Comcast IP Phone VII, LLC
8.	812736	Comcast Business Communications, LLC
9.	822102	Comcast Phone, LLC
10.	827142	Comcast Phone II, LLC
11.	819692	Comcast Phone of Maryland, Inc.
12.	819690	Comcast Phone of Northern Virginia, Inc.
13.	824416	Comcast Phone of New York, LLC
14.	820956	Comcast Phone of Michigan, LLC
15.	809372	MH Lightnet, LLC